FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 19, 2016

MICHAEL J. BERTRAND, TREASURER
NEVADA REPUBLICAN CENTRAL
COMMITTEE
PO BOX 95125
LAS VEGAS, NV 89193

Response Due Date
10/24/2016

IDENTIFICATION NUMBER: C00082925

REFERENCE: MARCH MONTHLY REPORT (02/01/2016 - 02/29/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action**. Additional information is needed for the following **6** item(s):

1. The totals listed on Line(s) 11a(ii), 11a(iii), and 11(c), Column B of the Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

2. Schedule A discloses an aggregate year-to-date total for a contribution from a political committee which appears to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions from political committees must be itemized on Schedule A regardless of the amount. (52 U.S.C. §30104(b)(3)(B) (formerly 2 U.S.C. §434(b)(3)(B)) and 11 CFR § 104.3(a)(4)(ii)) Please amend your report to provide the correct aggregate year-to-date totals.

3. Schedule B supporting Line 30(b) of your report discloses a payment(s) for "Advertising" and "January Ads" which is categorized as Federal Election

Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

4. Please clarify the expenditure made for "Caucus locator service" on Schedule B. If a portion or all of these expenditures were made for activity that promotes or opposes a Federal candidate, but does not qualify as exempt party activity, this amount should be disclosed on Schedule B or F supporting Lines 23 or 25. (11 CFR §§104.3(b), 104.17(a) and 106.1)

5. Schedule B of your report discloses reimbursements to individuals. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in $200 or more in a calendar year, **a memo entry including the name and address of the original vendor**, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §300.36(b), and Advisory Opinions 1992-1 and 1996-20, footnote 3)

6. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "Entertainment", "Misc", and "Office." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered**.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1185.

Sincerely,

Samantha Hay

Samantha Hay
Campaign Finance Analyst
Reports Analysis Division

332